

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ALENA TROIA, on behalf of herself and
other individuals similarly situated,

Plaintiffs,

v.

NORTH CENTRAL COLLEGE,

Defendant.

Case No. 1:20-cv-05229

PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL

PLEASE TAKE NOTICE that Plaintiff Alena Troia ("Plaintiff"), by and through her counsel, respectfully moves for an Order under Federal Rule of Civil Procedure 23:

(1) Preliminarily approving the proposed Settlement on behalf of the Settlement Class according to the terms of the Agreement;

(2) Provisionally certifying, for purposes of settlement only, the Settlement Class defined as:

All enrolled undergraduate students during the Spring 2020 semester who registered for at least one in-person class at North Central College and who paid tuition or fees, or on whose behalf tuition or fees were paid. Excluded from the Settlement Class are (1) any District Judge or Magistrate Judge presiding over this Action and members of their families; (2) the Defendant, Defendant's subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and their current or former officers, directors, agents, attorneys, and employees; (3) persons who properly execute and file a timely request for exclusion from the class; and (4) the legal representatives, successors or assigns of any such excluded persons.

(3) Preliminarily appointing Plaintiff as Class Representative;

(4) Preliminarily appointing (Eddie) Jae K. Kim and Tiffine Malamphy of Lynch

- Carpenter, LLP, Jason Sultzer of Sultzer & Lipari, PLLC, and Michael A Tompkins of Leeds Brown Law, P.C., as Class Counsel to act on behalf of the Settlement Class and Class Representative with respect to the Settlement;
- (5) Approving the Parties' proposed notice procedure, including approving the Parties' selection of Apex Class Action LLC as Settlement Claims Administrator, and approving the Parties' proposed schedule;
- (6) Entering the proposed Preliminary Approval Order, which was submitted concurrently herewith; and
- (7) Granting such other and further relief as may be just and appropriate.

This Motion is based upon this notice, the Declaration of (Eddie) Jae K. Kim and the accompanying exhibits, the Declarations of Jason P. Sultzer and Michael A. Tompkins, the concurrently filed memorandum of points and authorities, and upon all prior proceedings, pleadings, and filings in the above-captioned action.

Dated: February 7, 2025

Respectfully submitted,

PLAINTIFF ALENA TROIA

By: /s/ (Eddie) Jae K. Kim

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